

BROWN GAVALAS & FROMM LLP

355 LEXINGTON AVENUE
NEW YORK, NEW YORK 10017

TEL: (212) 983-8500

FAX: (212) 983-5946

www.brownngavalas.com

bgmail@brownngavalas.com

NEW JERSEY OFFICE

1118 CLIFTON AVENUE

CLIFTON, NJ 07013

TEL: (973) 779-1116

FAX: (973) 779-0739

HARRY A. GAVALAS

(1978-1999)

ROBERT J. SEMINARA

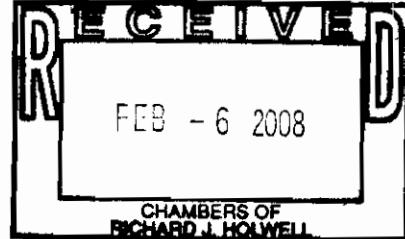
(1987-1999)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 2/15/08
DATE FILED: 2/15/08

February 6, 2008

BY HAND

The Honorable Richard J. Holwell
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1950
New York, New York 10007



Re: Jalapa Shipping Ltd. v. Sundersons Ltd., et al.
07 CV 8715 (RJH)
Our Ref. No.: 1593.0003

Dear Judge Holwell:

We represent the Plaintiff in this matter and write to request an additional 60 days to serve the Defendants with a copy of the Summons and Verified Complaint. This is our first request for such relief. The 120-day time limit for service mandated by Fed. R. Civ. P. 4(m) expires on February 6, 2008. While service upon foreign defendants is explicitly exempted from the Rule 4(m) time limit, we make this application in good faith to protect our client's interests.

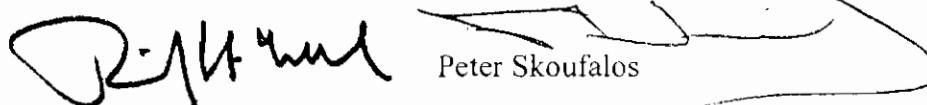
Plaintiff initiated this action on October 9 2007, seeking security for its maritime claims via an attachment of the Defendants' property in this district pursuant to Supplemental Rule B. The requested Order for Process of Attachment was signed by Your Honor on the same day and subsequently served on New York banks. Although various funds were initially attached, these funds were released from attachment by the Court's order dated January 4, 2008, which found that the funds were property of a non-party, Conti-Agro Nigeria Ltd.

We are currently preparing to file an amended complaint in this matter adding Conti-Agro Nigeria Ltd. as a defendant. We therefore request an additional 60 days, until April 7, 2008, to serve the defendants, including the defendant to be added in the amended complaint.

BROWN GAVALAS & FROMM LLP

The Honorable Richard J. Holwell
February 6, 2008
Page 2

We thank the Court for its consideration of this matter.

Application Granted Respectfully submitted,
So ORDERED BROWN GAVALAS & FROMM LLP

Peter Skoufalos
USDS
2/13/08